

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA)
)
)
 Criminal No. 1:14-CR-306
v.)
)
 The Honorable Gerald Bruce Lee
PEDRO ANTHONY ROMERO CRUZ,)
)
 ET AL.,)
)
 Defendants)
)

**GOVERNMENT'S MOTION TO EXTEND TIME
WITHIN WHICH TO FILE REONSE BRIEFS**

The United States respectfully requests the Court to grant the government two additional weeks to file responses to the defendants' non-evidentiary and evidentiary pretrial motions. The defendants have already filed 36 non-evidentiary motions in this case, and the government expects that they will file additional motions before the deadline. In order to effectively address the issues raised, the government asks for a two-week extension for responding to the non-evidentiary motions. Also, in anticipation of a similarly large number of evidentiary motions, the government asks for a two-week extension to respond to those as well.

On April 2, 2015, the Court issued a briefing schedule setting forth the dates when the parties must file their motions, oppositions, and replies. If the Court grants the government's request, the revised briefing schedule would be as follows (with the original date in parenthesis):

<u>Type of Pleading</u>	<u>Date to be Filed</u>
Non-evidentiary pretrial motions	7/24/2015
Oppositions to non-evidentiary pretrial motions	8/21/2015 (8/07/2015)
Replies to non-evidentiary pretrial motions	8/28/2015 (8/14/2015)
[Hearing on the non-evidentiary pretrial motions	9/11/2015]

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Evidentiary pretrial motions	8/25/2015
Oppositions to evidentiary pretrial motions	9/22/2015 (9/08/2015)
Replies to evidentiary pretrial motions	9/29/2015 (9/14/2015)
[Hearing on evidentiary pretrial motions	10/13-15/2015 10/19-20/2015]

The requested extension would not require the Court to reschedule the hearing dates.

Accordingly, the government requests the Court to grant the government's motion for a two-week extension for responding to both non-evidentiary motions and evidentiary motions.

Respectfully submitted,

DANA J. BOENTE
UNITED STATES ATTORNEY

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 24, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will then send electronic notification of such filing (NEF) to defense counsel on the case.

/S/

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ORDER

Upon motion of the United States to extend the time within which the government must file response briefs, and for good cause shown, it is hereby

ORDERED that all oppositions to non-evidentiary pretrial motions be filed by 8/21/2015 and that all replies to non-evidentiary pretrial motions be filed by 8/28/2015;

It is further ORDERED that all oppositions to evidentiary pretrial motions be filed by 9/22/2015 and that all replies to evidentiary motions be filed by 9/29/2015.

Alexandria, VA

The Honorable Gerald Bruce Lee
United States District Judge